

RICHARD H. RIGGS

Business Consultant
Public Relations / Advertising
Suite 1102 • Bank One Tower

P.O. Box 1314
Lima, Ohio 45802
(419) 228-0029

July 24, 1991

James J. Brown
Assistant Chief
Video Services Division
Federal Communications Commission
Washington, D. C. 20554

Dear Mr. Brown:

This letter will acknowledge notice from you addressed
to Biggs-Hutchinson & Association, Inc. P. O. Box 1137.

INITIAL DISCOVERY

Document Production. With respect to all times that Robert G. Casagrande has been identified in this petition as an officer, director and/or stockholder of Stations WCSJ(AM) and WCFL(FM), Morris, Illinois; WNRJ(AM) and WAHC(FM), Circleville, Ohio; WWHT(FM), Marysville, Ohio; and WQTL(FM), Ottawa, Ohio, (hereinafter collectively "Casagrande Stations"), the following categories of documents should be produced:

- a. All station logs, required to be maintained pursuant Section 73.1820 of the Commission's rules.
- b. All correspondence to or from the Federal Communications Commission regarding the Casagrande Stations, including, but not limited to, any Notice of Apparent Liability, Notice of Forfeiture, Notice of Radio Station Conditions, or inquiry regarding the technical operation of the stations, the location of the main studio and/or remote control points, or any alleged violation of the Commission's Rules.
- c. All notes in the possession, custody or control of Casagrande, including notes in the files of M.M. Group and/or Riggs-Hutchinson, concerning the technical operation of the Casagrande Stations.

2.

- d. All agreements, leases and related correspondence pertaining to the location of studios, whether main or auxiliary, and/or remote control points for the Casagrande Stations.
- e. All letters designating chief operators for the Casagrande Stations, as required by Section 73.1870 of the Commission's rules.
- f. All applications filed with the Federal Communications Commission, with respect to the Casagrande Stations, including, but not limited to, applications for transfer of control or assignment of one or more station licenses, applications for modification of station facilities, applications for renewal of station licenses, and applications for auxiliary facilities.
- g. All ownership reports prepared and all correspondence relating to the preparation and/or filing of such reports with the Federal Communications Commission.
- h. All annual employment reports prepared and all correspondence relating to the preparation and/or filing of such reports with the Commission.

3.

- i. All other documents relating in any way to any violation of the rules of the Federal Communications Commission with respect to the operation of the Casagrande Stations.

Inspection. Pursuant to Section 1.325(a), Ms. Scantland, through her representatives, wishes to inspect each studio location and/or transmitter location of the Casagrande stations to the extent that they remain in the possession, custody or control of Casagrande or any corporation of which he is a principal.

Depositions. With respect to the issues to be designated, Ms. Scantland intends to issue notices of deposition to Robert G. Casagrande, Mark Litton and Robert Maccini, who is the federal receiver of M.M. Group. Additionally, upon learning their names, Ms. Scantland will seek to depose those persons who were the chief operators of the Casagrande Stations during the period of time that Casagrande was a principal of the licensees.

CERTIFICATE OF SERVICE

I, Pamela R. McKethan, hereby certify that on this 4th day of June, 1993, copies of the foregoing **PETITION TO ENLARGE ISSUES** were hand-delivered and mailed, first class, postage prepaid, to the following:

Administrative Law Judge Arthur I. Steinberg *
Federal Communications Commission
2000 L Street, N.W., Suite 228
Washington, D.C. 20554

Norman Goldstein, Esquire *
Federal Communications Commission
Mass Media Bureau, Hearing Division
2025 M Street, N.W., Suite 7212
Washington, D.C. 20554

Gene A. Bechtel, Esquire
Bechtel & Cole, Chartered
1901 L Street, N.W., Suite 250
Washington, D.C. 20036


Pamela R. McKethan

* HAND DELIVERED